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November 20, 2022

By ECF & Email

Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: *United States v. Abuchi Felix*, 21 Cr. 472 (KPF)**

Dear Judge Failla:

Mr. Abuchi Felix respectfully requests permission to travel for 10 days in December 2022 to Norway to visit his two children and their mother who reside there. From the date that Your Honor permitted Mr. Felix to seek employment, he has been gainfully employed as a training consultant for various healthcare companies. His employment has required him to travel to locations in various states across the country. His job generally requires him to work six or seven days at a time. He is well-remunerated for his services and has maintained excellent job evaluations.

Mr. Felix has been fully compliant with all the terms of his supervision. We recognize that this request is unusual. The cost of his family traveling to the US is prohibitively expensive and he has no place to house them. However, under the circumstances, we believe it is justified. Probation defers to the court. The Government takes no position.

Very truly yours,

*James Roth*  
James Roth, Esq.

cc: PTO Francesca Tessier-Miller (By Email)  
PTO Izlia Sanchez (By Email)  
PTO Vincent Imbrosciano (By Email)



AUSA Matthew King (By ECF & Email)  
AUSA Micah Ferguson (By ECF & Email)

Application DENIED. The Clerk of Court is directed to terminate the pending motion at docket entry 179.

Dated: November 21, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE